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Comments on the Strategic NAIS plan

The timeline to make premises registration required in January 2008, which is also the timeline for animal identification, is unacceptable for the following reasons:

- Premises Registration is relatively painless for the producer, yet provides animal health regulatory officials invaluable information to better respond to an emergency animal disease outbreak.
- The premises registration needs to be in place well before requiring animal identification for a smoother transition.
- There are a large percentage of producers that will not sign up for a voluntary program, therefore making it difficult for states to reach the suggested stage levels in a reasonable time frame.
- Waiting till 2008 may push several states to make their own legislation to require registration that could lead to conflicting requirements and premise definitions.

Confidentiality of NAIS Data – There is obvious producer/industry concern regarding the potential for open disclosure (FOIA) of the data. The passage of federal legislation to protect NAIS data would greatly improve producer confidence and participation.

NAIS data (premise and animal) collected for a particular state must be shared in its entirety with state animal health officials. This is made evident by the following:

- The **Draft Strategic Plan** (p. 5) states "...APHIS is focusing on animal identification for one reason: to establish the animal information foundation necessary to support animal disease monitoring, surveillance, control, and eradication programs." IDOA animal health officials have the same goal.
- The **Draft Strategic Plan** (p. 12) states "Partnerships among all stakeholders are the foundation for achieving this tremendously important and extremely challenging goal."
- It is essential that state animal health officials have unrestricted access to NAIS data in order to carry out their role and responsibility related to homeland security/bio-terrorism matters.

Enforcement & Compliance is not addressed in the **Draft Strategic Plan**. Enforcement & compliance responsibilities should be addressed well in advance of making any NAIS component mandatory.

